

**PARKER HANSKI LLC**

40 WORTH STREET, SUITE 602  
NEW YORK, NEW YORK 10013  
PHONE: 212.248.7400  
FAX: 212.248.5600

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/28/2024
--

February 27, 2024

**MEMO ENDORSED**

Via ECF

The Honorable Barbara C. Moses  
United States Magistrate Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

Re: *Plaintiff's Response to the Court's February 26, 2024 Order*  
*Amy Meisner v. 623 Ninth Avenue Associates, LLC and Lotus West Corp.;*  
*Docket No. 1:23-cv-05833 (ALC) (BCM)*

Dear Judge Moses:

Parker Hanski LLC represents the plaintiff in the above-reference matter and writes pursuant to Your Honor's Order of February 26, 2024.

**Judicial Assistance Not Required**

Given Defendants' representations to the Court in their February 23, 2023 letter (Dkt. 31), plaintiff does not seek judicial assistance to resolve the issues raised in her February 20, 2024 letter-motion. (Dkt. 29.) Consequently, plaintiff respectfully withdraws her letter motion.

**Filing of Discovery Demands at Issue**

With respect to Your Honor's Individual Practices pertaining to discovery motions, specifically, section 2(b), plaintiff did not include copies of her discovery requests with her letter motion because there was no dispute as to any specific discovery request. This is because defendants had not provided any responses (inclusive of any objections) to plaintiff's discovery demands. As defendants failed to respond to plaintiff's meet and confer requests, plaintiff sought the Court's assistance to compel defendants to provide their responses on a general level, as opposed to any specific discovery demand. To the extent that plaintiff was still obligated to file her discovery demands, she misinterpreted the requirement contained in section 2(b) of Your Honor's Individual Practices. As plaintiff has withdrawn her request for judicial assistance, to the extent the Court's Orders of February 21, 2024 and February 26, 2024, (Dkts. 30 and 32) still require plaintiff to file the discovery demands related to her letter-motion, plaintiff respectfully asks that the Court relieve her of her obligation to file the discovery demands.

Thank you for your attention to this matter.

Application GRANTED. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 29 as withdrawn.  
SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
February 28, 2024

Respectfully submitted,

/s/  
Robert G. Hanski, Esq.